

AHEAD Committee | Request Regarding Data Standards

Submitted by (David Kafafian) Employers / Business

Context & Statement of Support:

We appreciate and are supportive of Congress's and the Department's efforts to ensure that Workforce Pell is only made available to students attending programs that meet quantifiable outcomes standards. We also recognize that program providers, states, workforce boards, and the Department are at various levels of data maturity, which may impact the Department's ability to administer Workforce Pell. Finally, we believe all parties are desirous of a world where data that is produced across programs, providers, and states can be used to improve transparency with respect to program outcomes for students.

In this vein, we support the below textual revisions to the Department's proposed regulations.

Textual Revisions

REVISION 1:

Revise 690.93 (b) to read: "...of this section that is made publicly available, **including, at a minimum, in structured, open, linked, and interoperable data formats**, and includes –“

OR

Revise 690.93 (b)(2) to read: “The information an institution must submit to the Governor, **including, at a minimum, in structured, open, linked, and interoperable data formats**, to assess...”

REVISION 2:

Revise 690.94 (a) to read: “the institution must submit to the Secretary, **including, at a minimum, in structured, open, linked, and interoperable data formats**, documentation that—”

REVISION 3:

Revise 690.94 (b) to read: “For each award year after the date that the eligible workforce program is approved, the institution must, **including, at a minimum, for those award years three years prior, in structured, open, linked, and interoperable data formats—**”

Clarification Regarding Data to be Submitted in this Format

Purely for the context of the Department, and not requiring updates to the regulatory text, the data that we would like reported in structured, open, linked, and interoperable formats are:

- Provider name
- Credential and skills information

Commented [DK1]: NOTE: Added this as an option. I think Scott is wrong to try and include the first option as I think the Dept was quite clear that 690.93 (b) was describing the process the Governor is publishing. As a result, I actually think this backup proposal is the only thing the Dept may plausibly accept here.

Commented [DK2]: NOTE: Sorry if I'm being dense, but I'm confused where / how the three years comes into play here. Is this what you're looking for?

Thanks!

- Outcome and performance information (specifically, completion, placement, and earnings data)
- CIP / SOC info -- the alignments to sectors and occupations

All of which we would like to see reported at the level of detail (e.g. cohort, program, institution), specified in the relevant portion of the regulatory text.